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April 2, 1993

Federal Communications Commission  
1919 M Street, Suite 222  
Washington, DC 20554

Re: Comments on Docket 92-235

Ladies and Gentlemen,

This letter addresses Lane County's concern about the impact upon implementation of FCC Docket 92-235 regarding changes to the public safety radio system. Our evaluation of the proposal is as follows:

1. The State of Oregon has a sufficient number of radio channels available for use. Our understanding of the reason for Docket 92-235 is that there are an insufficient number of channels available in the largest metropolitan areas. Rather than change all user channels would it be possible to amend regulation of channels only in the areas experiencing an insufficient number of channels?
2. The public safety radio system ranks second only to the National Defense Radio System. Is it necessary to amend all public safety radio systems to accommodate the need for commercial radio channels?
3. The radio technology to comply with the new regulations is not yet available. In addition, we will be unable to make an orderly transition from the current operating system to the new system since we will be unable to use any part of our existing radio system given the new guidelines.
4. The implementation date of January 1, 1996 is unrealistic in light of the lack of technology and the substantial public expense to completely replace our existing radio system. The financial burden to replace our public safety radio system is estimated at several hundred thousand dollars.
5. Our existing higher powered radio system leaves us with "pockets" of areas where transmission is not possible. The lower powered systems required by Docket 92-235 would further erode our ability to communicate on our public safety radio system.

We respectfully request that you either indefinitely delay the implementation date of Docket 92-235 or that you provide the State of Oregon with an exemption for the implementation of these proposed changes. In addition, we would suggest that you work with the Associated Public Safety Communications Officers, Inc. to develop a proposal that will maintain a viable public safety radio system in the best public interest.

Sincerely,

Steve Cornacchia, Chair  
Lane County Board of Commissioners

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